

# **EXHIBIT A**

PITTS & POLIZZI, LLP  
A Partnership of Professional Corporations  
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Attorneys for Plaintiff(s)

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Arnulfo B. Balderama,	)	SUPERIOR COURT OF NEW JERSEY
	)	LAW DIVISION: PASSAIC COUNTY
	)	DOCKET NO:
Plaintiff(s)	)	
	)	Civil Action
vs.	)	
	)	
	)	
Nestor A. Sandoval, Paragon Leasing,	)	
Inc., Stevens Transport, Inc. and John	)	COMPLAINT AND JURY DEMAND
Does 1-5 (fictitious names)	)	
Defendant(s)	)	

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The plaintiff(s) residing in the County of Passaic and State of New Jersey by way of complaint against the defendants says:

1. On or about October 12, 2016 the plaintiff Arnulfo B. Balderama was the owner and operator of a motor vehicle which was proceeding on Schuyler Avenue in Harrison, New Jersey.
2. At the time and place aforesaid, the defendant(s), Paragon Leasing, Inc. and/or Stevens Transport, Inc. was the owner of a motor vehicle being operated by Nestor A. Sandoval and/or John Does 1-5 which was proceeding on Schuyler Avenue in Harrison, New Jersey.
3. At the time and place aforesaid, the defendant(s) was negligent and careless in the operation of said motor vehicle or was otherwise inattentive which negligence and carelessness caused said vehicle to strike the vehicle of the plaintiff(s).

4. As a direct and proximate result of the negligence and carelessness of the defendant, as aforesaid, the plaintiff was caused to sustain severe and permanent injuries, which has caused great pain and suffering and plaintiff has been prevented from pursuing usual daily activities.

5. At the same time and place aforesaid, the defendant(s) Paragon Leasing, Inc. and/or Stevens Transport, Inc. was the owner of a motor vehicle then and there being operated as agent, servant and/or employee by the defendant Nestor A. Sandoval and/or John Does 1-5.

WHEREFORE, plaintiff, Arnulfo B. Balderama demands judgment against the defendants, Nestor A. Sandoval, Paragon Leasing, Inc., Stevens Transport, Inc. and John Does 1-5, jointly severally or in the alternative for damages together with interest and costs of suit.

**JURY DEMAND**

Plaintiff demands trial by jury of six on all issues herein.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, Dennis G. Polizzi, Esq. is hereby designated as Trial Counsel in this matter.

**CERTIFICATION**

I hereby certify that the foregoing pleading has been filed within the time period set by the applicable Court Rules and extensions thereof.

Pursuant to R. 4:5-1 I hereby certify that I have no knowledge of any other pending actions or proceedings concerning the subject matter of this action. It is not anticipated at this time that there is any other party who should be joined in this action.

PITTS & POLIZZI, LLP  
Attorneys for Plaintiff

/s/ Dennis G. Polizzi

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Dennis G. Polizzi, Esq.

Dated: September 8, 2018

**DEMAND FOR INTERROGATORIES**

Pursuant to R. 4:17-1, the Plaintiff hereby demands that each individual defendant provide certified answers to Form C and Form C(1) Interrogatories set forth in Appendix II of the Rules of Court.

**DEMAND FOR PRODUCTION OF DOCUMENTS**

**PLEASE TAKE NOTICE** that pursuant to Rule 4:18-1, plaintiff hereby demands that the defendant(s) produce the following documentation within thirty (30) days as prescribed by the Rules of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendants are therefore required to continuously update their responses thereto as new information or documentation comes into evidence.

1. Copies of any and all insurance policies, including declaration pages covering the answering defendants, including but not limited to primary insurance policies, secondary insurance policies, umbrella insurance policies and/or UM/UIM endorsements that could insure the plaintiff.
2. Copies of any and all documentation or reports, including but not limited to police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.
3. Copies or duplications of any and all photographs, motion pictures, videotapes, films, drawings, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.
4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, business,

corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to any contracts between the owner of the property, product or motor vehicle involved in the incident in question and any of the parties involved in this matter.

6. Copies of any and all documentation, including but not limited to safety manuals, statutes, rules, regulations, books and/or industry standards which refer to, reflect or otherwise related to the incident in question or any potential defense to the action in question.

7. Copies of any and all discovery received from any other parties to the action in question.

8. Copies of any and all reports on the answering defendants received by the plaintiff, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

9. Copies of any and all medical information and/or documentation concerning the plaintiffs in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

10. Copies of any and all records of any type subpoenaed by the defendants or received from any other source concerning the plaintiff or the incident in question.

11. Any and all videotapes or moving pictures made of plaintiffs and/or the subject matter of accident.

12. Copy of the certificate of occupancy for the property where the incident occurred.